

The Honorable Lauren King

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF N.B.

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ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

1 I, N.B., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make  
3 this declaration based on my personal knowledge.

4 2. I have chosen to submit this declaration using only initials because I am fearful  
5 that the government could retaliate against me or my child, or individuals emboldened by recent  
6 actions of the Federal Government would target my family for speaking out.

7 3. I am the parent of a transgender and agender child, who I will refer to as “my  
8 child” to protect their anonymity. I am also the parent of a son, who I will refer to as “my son”  
9 for the same reason. My child’s gender at birth was assigned as female. Being transgender means  
10 they do not identify with the gender they were assigned at birth, and being agender means they  
11 do not identify with any specifically labeled gender.

12 4. My first awareness that my child was different was when they were very young.  
13 They refused to wear dresses to point of tears. They played with both toys designated for girl  
14 and toys designated for boys. They dressed themselves all the time, and by the age of two or  
15 three they were very firm in their outfit choices and expression. From that point on, I let them  
16 run with it. In kindergarten, my child wanted to have their hair cut very short and experimented  
17 with changing names at school. I had a few teachers come up to me and tell me.

18 5. Throughout childhood, my child had a sense of unease. A lot of the clothes that  
19 we shopped for in their section did not seem to fit them and were just not right for them. There  
20 were issues with self-esteem, a lot of wondering “who am I?”, and depression, and anxiety. There  
21 was one time that their anxiety was so bad they went into the bathroom at school and couldn’t  
22 come out. I had to go pick them up. In hindsight, we know that they were experiencing gender  
23 dysphoria, a mismatch between my child’s body and their private experience of their gender  
24 identity.

25 6. As their gender dysphoria worsened, my child experienced suicidal ideation, and  
26 self-harming, as well as issues of substance abuse. My child and I are very close. They were able

1 to turn to me for help. This trust was important, because it helped them to lean on me in seeking  
2 gender-affirming care. I believe that care was what my child needed all along.

3 7. When my child was in middle school, they had about two months of in-person  
4 learning before the pandemic hit. That was when they told me that they were not a girl. They  
5 went through a period of conversation on their identity and changes in clothing. They expressed  
6 that they were unhappy and uncomfortable with their physical presentation, including their  
7 voice. They said that they wanted to start wearing a binder. They told their dad about this, and  
8 about their name change, and announced the change to the rest of our family.

9 8. A friend of my child's was taking testosterone, and recommended a gender clinic  
10 in Western Washington, where we waited for 6 months for an appointment. Once the waiting  
11 period was over, the doctor and other professionals we worked with were highly diligent and  
12 thorough in explaining options for gender-affirming care as well as its risks and benefits. There  
13 were many such appointments, and the information provided was extensive, both orally and in  
14 writing. There was bloodwork that we needed to do, and counseling with the whole family, but  
15 we jumped through all the hoops, and gave our consent for the doctor to order gender-affirming  
16 care for our child, including testosterone therapy.

17 9. Today my child is doing better than they were before receiving any gender-  
18 affirming care. Hormone replacement therapy has given my child hope, because their body better  
19 matches who they are inside. Their depression and anxiety have greatly lessened, and their ability  
20 to function and their social skills have improved. They want to engage in activities and spend  
21 time with friends. They think about the future and their plans and dreams.

22 10. I worry for them constantly though. The climate is not friendly towards  
23 transpeople, and I hate to think of them being harassed just for who they are. There was one  
24 incident recently that really shook me. I took my child to the doctor's office for routine  
25 bloodwork to check hormone levels. The phlebotomist refused to draw their blood and cited  
26 many reasons in their justification for denying my child the care they needed. None of those

1 reasons checked out. We were told that the labs hadn't been dated properly; they had. We were  
2 told that they had expired; they hadn't. We were told that their manager wouldn't let them; this  
3 was untrue. They even repeatedly used the birth name instead the preferred name and incorrect  
4 pronouns when talking to and about my child, despite this information being noted in my child's  
5 chart. Our regular nurse was on the phone with us during this experience to confirm that the  
6 phlebotomist should not have any clerical error in the doctor's orders that prevented them from  
7 performing their duties, but they were making a big deal about everything and seemed defiant.  
8 In that moment, I knew it was discrimination. This was a humiliating and embarrassing  
9 experience for my child. It also shocked and upset me, because it showed me firsthand that if my  
10 child could be denied care and dignity on a whim, based on their identity, anyone could have  
11 their dignity undermined in the same way.

12 11. I am aware the President of the United States has issued an Executive Order  
13 restricting and preventing gender-affirming care for people under age 19.

14 12. I would be very concerned if the restrictions in this Executive Order were to affect  
15 medical providers in Washington. Specifically, if my child were unable to receive the care that  
16 they needed, I'd be fearful of what could happen to them. I'd be scared of losing them to suicide,  
17 or of watching them retreat back into substance abuse. I'd do anything to ensure access to their  
18 gender-affirming care. I'd travel to Canada. I would access hormones for my child in any way  
19 that I could. I'd rather get these medications at a U.S. pharmacy, as we do today. There, I know  
20 they're safe. But I'm not willing to lose my child. Gender-affirming care saved my child's life.

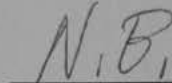
21 13. After the incident with the phlebotomist denying care to my child, the doctor at  
22 the gender clinic recommended that we file a complaint. I did this, but I don't know that anything  
23 came of it. After the Federal Government's Executive Order came out, my child and I talked  
24 about it. My child understood that their experience of discrimination was happening to other  
25 people, too. Around that time, a social media group I follow urged families with transgender  
26 children to communicate their stories to the Washington Attorney General's Office. I discussed

1 this with my child and let them make the call about whether to become involved. They decided  
2 that we should share our story, and that in doing so, we might be able to help people.

3 14. Acting alone, it is unlikely that my family could challenge the Federal  
4 Government's Executive Order. We lack the time, energy and knowledge—we wouldn't know  
5 where to begin. Having the help and expertise of the state behind this challenge is encouraging.  
6 It gives me hope for my child, and for all the other affected individuals and families who are  
7 supporting this effort. When enough people stand together, they can change the world.

8 I declare under penalty of perjury under the laws of the State of Washington and the  
9 United States of America that the foregoing is true and correct.

10 DATED this 13th day of February 2025.

11 

12 N.B.

13 Parent of K.B.